Statement of Basis - Narrative
NSR Significant Revision

Company: Williams Four Corners, LLC
Facility: El Cedro Gas Treating Plant
Permit No(s).: 0340-M11 and P046R2
Tempo/IDEA ID No.: 1002 - PRN20140002
Permit Writer: Daren K. Zigich

Permit Review	**Date to Enforcement:** 11/18/14	**Inspector Reviewing:** Sondra Sage
	Date Enf. Review Completed: 12/2/14	**Date of Reply:** NA
	Date to Applicant: 11/17/14	**Date of Reply:** TBD
	Date of Comments from EPA: N/A	**Date to EPA: N/A**
	Date to Supervisor: TBD	

1.0 Plant Process Description:

The Williams Four Corners, LLC, (WFC) El Cedro Gas Treating Plant is located approximately 24 miles east of Blanco, Rio Arriba County, New Mexico at T29N-R5W-S31. The Universal Transverse Mercator (UTM) coordinates for this facility are: UTM E 285,420 m, UTM N 4,063,060 m, and UTM zone 13.

The purpose of the facility is to compress, dehydrate, and remove CO_2 from coal-seam and conventional natural gas using engines, turbines, heaters, dehydrators, and an amine unit. The facility is also receiving additional condensate from other locations. Vapors from this condensate will be captured by a condensate stabilizer and re-routed for processing at the plant.

2.0 Description of this Modification:

This modification consists of, revising serial numbers and manufacture dates for Units 3 and 7, updating Unit 15 and 16 operating parameters, correcting NOx, CO and particulate mass emission limits for Units 17 and 18, correcting a permitting error by adding back in Unit 37 and removing Unit 46, increasing truck loading emissions, updating SSM and produced water tank emissions, revising condensate throughput monitoring and removing Units 22, 25, 26, 27, 29, 30, 32, 33 and T31 from the permit. The description of this modification is for informational purposes only and is not enforceable.

3.0 Source Determination:

1. The emission sources evaluated include the units listed in Tables 2-A and 2-B of the application.

2. Single Source Analysis:

A. SIC Code: Do the facilities belong to the same industrial grouping (i.e., same two-digit SIC code grouping, or support activity)? Yes

B. Common Ownership or Control: Are the facilities under common ownership or control? Yes

C. Contiguous or Adjacent: Are the facilities located on one or more contiguous or adjacent properties? Yes

3. Is the source, as described in the application, the entire source for 20.2.70, 20.2.72, 20.2.73, or 20.2.74 NMAC applicability purposes? Yes

4.0 **PSD Applicability:**

A. The source, as determined in 3.0 above, is an existing PSD Major Source and will remain a major PSD source after this modification.

B. The project emissions for this modification are not significant for any regulated pollutant. VOC emissions are the only increase and the increase is less than 10 tons per year (tpy) which is less than the 40 tpy significant increase level.

C. Netting is not required.

D. BACT is not required for this modification (minor Mod).

5.0 **History (In descending chronological order, showing NSR and TV):** *The asterisk denotes the current active NSR and Title V permits that have not been superseded.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
*PSD-0340M11	TBD	Significant Permit Revision/PSD minor modification	revising serial numbers and manufacture dates for Units 3 and 7, updating Unit 15 and 16 operating parameters, correcting NOx, CO and particulate mass emission limits for Units 17 and 18, correcting a permitting error by adding back in Unit 37 and removing Unit 46, increasing truck loading emissions, updating SSM and produced water tank emissions, revising condensate throughput monitoring and removing Units 22, 25, 26, 27, 29, 30, 32, 33 and T31 from the permit.
*P046R2	5/16/14	TV Renewal	TV renewal incorporates NSR permit changes from 1/28/11 forward.
0340M10R1	4/22/14	NSR Admin	Facility-wide correction/addition of serial numbers for both Skids and engines/ turbine combustors

Permit Number	Issue Date	Action Type	Description of Action (Changes)
PSD-0340M10R2	9/18/13	NSR Tech Rev	The purposed of this Technical Revision is to replace permitted Unit 37 (0.8MMBtuhr) with Unit 46 (1.3 MMBtu/hr). The potential increase in emissions are: 0.2 tpy of NOx and 0.2 tpy of CO. Unit 47 is added pursuant to 20.2.72.219.B(1)(b) NMAC. Additionally, corrections are made to the construction/manufacture dates and serial numbers of other units. Five exempt [per 20.2.72.B(1)(a)] heater units, #41-45, have been added in this application.
0340M10R1	4/22/13	NSR Admin	Corrected typographical errors in TV Permit P046R1M1 for units 17, 18, 32, & 33. The engines are 4SRB not 4SLB. The units had the correct regulatory analysis.
	2/23/12	RO chg	RO chg
340-M10	2/13/12	Significant Permit Revision/PSD minor modification	The proposed modification consists of inclusion of a 10 tpy cap of Malfunction emissions. In addition, this modification incorporates updated permit language for SSMs. **SSM:** In accordance with 20.2.7.15 NMAC, WFC is applying to permit emissions exceeding an emission limitation due to routine and predictable startup, shutdown, and maintenance (SSM). For this facility SSM emissions include venting natural gas from compressors (Units 1a-10a, 15a, 16a, 32a, & 33a) and associated piping resulting in emissions of 10.8 tons per year of VOCs and small quantities of HAPs. **Malfunction:** Apply for a maximum of 10 tpy of VOC emissions from venting caused by malfunctions as defined in 20.2.7.7.E NMAC. This is in accordance with AQB's guidance Implementation Guidance for Permitting SSM Emissions and Excess Emissions dated January 1, 2011.
P046R1M1	1/28/11	TV Significant Modification	Incorporates the significant revisions of NSR Permit 340-M9, as seen below.
340-M9	5/4/2010	Significant Permit Revision/ PSD minor modification.	The modification consists of: the addition of one 1232 hp engine, the removal of three 1232 hp engines, increase of emissions for two glycol dehydrators, increase volume throughput in condensate tanks, addition of emissions from flares, truck loading, equipment leakage, and updating emissions for various engines, turbines, and for start-up, shutdown, and maintenance.
340-M8	9/15/08	Significant Permit Revision. PSD minor modification.	This modification consists of increasing the condensate throughput to the facility from 618,660 gal/yr to 3,390,000 gallons per year; adding a condensate stabilizer and associated reboiler/heater (reboiler Unit 37); adding a 21,000 gal condensate storage tank (Unit T-91028); modifying emissions from the existing condensate storage tanks (T-91019, 91020, and 91021); and adding condensate truck loading (Unit 38).

Permit Number	Issue Date	Action Type	Description of Action (Changes)
P046R1	9/15/08	Renewal and significant modifications	TV renewal & incorporation of all significant modifications accomplished by NSR 0340M7.
0340-M7R3	8/20/07	Administrative Revision	This revision consists of a like-kind engine replacement for a Waukesha 7042GL compressor engine for permit unit number 1 from old unit package serial number x00387 to new unit package serial number x00172.
0340-M7R2	7/23/07	Administrative Revision	Administrative revision to correct typographical error in Table 1.1, to indicated that Units 32-36 will be equipped with AFRs and dual element nonselective catalytic reduction (NSCR) instead of AFR and oxidation catalysts.
0340-M7R1	4/16/07	Administrative Revision	This revision consists of a like-kind engine replacement for a Waukesha 7042GL compressor engine for permit unit number 9 from old unit package serial number x00395 to new unit package serial number x00068.
NSR 0340-M7	3/19/07	Minor Mod.	The Permit superseded NSR Permit 0340M6. The applicant has proposed the following revisions to the permit: • Remove five Waukesha 7042 GL engines (Units 10-14) from the permit; • Change the emission rates and operational limitations of units 1-9 back to those; existing prior to the issuance of permit PSD-NM-340-M5; • Remove the Wheco heater (Unit 21) from the permit; • Remove the Enertek J2P20M11109 dehydrators (Units 23 & 24) from the permit as they were never installed. • Add existing amine contactor (Unit 31) to the permit. • Add five Waukesha L7044 GSI natural gas fired reciprocating engines (32-36) to the permit; • Add existing condensate storage tanks (Units T-3263, T-3265 & T-8364) to the permit and request an emissions cap for the combined units; Correct nameplate for Unit 22. • Make minor emissions updates and corrections (Units 18, 20, 22b & 28); and Minor miscellaneous updates and corrections.
P046M2	9/12/06	Administrative Amendment	Ownership name change to Williams Four Corners, LLC.
P046M1	6/20/06	Administrative Amendment	Change Responsible Company Official to Don Wieburg, Director Four Corners Area on June 02, 2006.
P046	2/19/03	New Title V	Initial Title V permit which includes NSR permits No. PSD-340M6 and No.PSD-340M6R2.

Permit Number	Issue Date	Action Type	Description of Action (Changes)
340-M6R2	3/20/01	Technical Revision	This permit revision consists of replacing the regulated equipment table and footnotes in Condition 1.c), (this does not include the storage tank table under Condition 1.c); and replacing the allowable emissions table and footnotes in Condition 2. In addition, this revision allows unit 25 to replace either unit 17 or 18 as needed. Only two (2) of the three (3) units (17, 18, or 25) shall operate at anyone time. The permittee shall increase the stack height of unit No. 17 so that it is no less than 16 feet above the ground. Added 20.2.61 NMAC as condition.
340-M6R1	2/5/01	Administrative Revision	Closed/withdrawn
340-M6	11/30/98	NSR Permit Revision	Two 20 MMSCF/D TEG dehydrators to process conventional gas
PSD-NM-340-M5	05/22/98	NSR Permit Revision	5 Waukesha 7042 GL engines & two 20 MMSCF/d TEG dehydrators
340-M4	11/15/96	NSR Permit Revision	1 Waukesha 7042 G engine
340-M3	07/10/95	NSR Permit Revision	1 Waukesha 7042 GL engine
340-M2R1	03/15/94	NSR Permit Revision	2 Waukesha 7042 GL engines, 2 Waukesha L7042 GSI engines, 1-Wheco 52 MMBTu/hr heater and 1-Born 52 MMbtu/hr heater
PSD-NM-340-M2	10/29/93	NSR Permit Revision	5 Waukesha 7042 GL engines, 52 MMBtu/hr Born heater and 55 MMSCF/d dehydrator
340-M1	06/04/91	NSR Permit Revision	Changed emission rates for existing MARS turbines & 5 Waukesha 7042 GL engines
340	02/16/81	New NSR	2 MARS turbines

6.0 **Public Response/Concerns:** As of November 10, 2014 the Department has received one public comment letter.

7.0 **Compliance Testing:**

Unit No.	Test Description	Test Date
15	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/04/13 Failed BACT limit
15	Re-tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/14/13 Passed
16	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/14/13 Passed
17	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/05/13 Failed, mass and BACT limits
17 & 18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/08/13 Passed mass and BACT limits

17 & 18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	09/04/13-09/05/13 17 Failed NOx mass limit, 17 & 18 Failed NOx BACT limit
18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	09/05/13 Failed CO BACT limit
17	Tested in accordance with EPA test methods for formaldehyde as required by 40 CFR 63, Subpart ZZZZ. Catalyst Replacement	9/4/13 Passed 76% control
17 & 18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	06/28/13 18 Failed NOx mass limit, 17 & 18 Failed NOx BACT limit
1-9	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	3/13-21/2013 Passed mass and BACT limits
18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	3/27/13 Failed NOx BACT limit
18	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	11/02/12 Failed NOx and CO BACT limits
4-6	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	10/01-02/2012 Passed mass and BACT limits
15	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	09/18/12 Passed
16	Tested in accordance with periodic monitoring test methods for NOx and CO as required by the Title V permit.	09/18/12 Failed NOx BACT limit – Not reported, Not retested

All engines and turbines, including Units 1-9, are subject to Periodic Testing to determine actual emissions and emission compliance.

8.0 <u>Startup and Shutdown:</u>

A. If applicable, did the applicant indicate that a startup, shutdown, and emergency operational plan was developed in accordance with 20.2.70.300.D(5)(g) NMAC? Yes
B. If applicable, did the applicant indicate that a malfunction, startup, or shutdown operational plan was developed in accordance with 20.2.72.203.A.5 NMAC? Yes
C. Did the applicant indicate that a startup, shutdown, and scheduled maintenance plan was developed and implemented in accordance with 20.2.7.14.A and B NMAC? Yes
D. Were emissions from startup, shutdown, and scheduled maintenance operations calculated and included in the emission tables? Yes. See Section A107 in the permit.

<u>Compliance and Enforcement Status:</u>

A compliance plan (called Other Provisions as requested by Williams) is being used to require Williams to correct the NSR permit mass emissions limits in Table 106.A for Units 17 and 18. In permit NSR 340-M9 the mass emissions limits were modified due to a corrected horsepower

rating of the engines. At that time the associated BACT limits were not correctly factored into the permitted mass emission limits. These limits were corrected in the Title V permit per 20.2.70.302.A(1) NMAC and the permit required Williams to submit an application to correct the NSR permit per 20.2.70.302.A(5) NMAC. This permitting action fulfills this requirement.

9.0 **Modeling:** A modeling waiver was approved by AQB's Eric Peters on August 13, 2014.

10.0 **State Regulatory Analysis(NMAC/AQCR):**

20 NMAC	Title	Applies (Y/N)	Comments
2.3	Ambient Air Quality Standards	N	20.2.3.9 NMAC, LIMITATION OF APPLICABILITY TO 20.2.70 NMAC. The requirements of this part are not applicable requirements under 20.2.70 NMAC, as defined by that part. This section does not limit the applicability of this part to sources required to obtain a permit under 20.2.72 NMAC, nor does it limit which terms and conditions of permits issued pursuant to 20.2.72 NMAC are applicable requirements for permits issued pursuant to 20.2.70 NMAC.
2.7	Excess Emissions	Y	Applies to all facilities' sources
2.35	Natural Gas Processing Plant - Sulfur	N	The Facility does not process natural or coal seam gas with H2S.
2.37	Petroleum Processing Facilities	N	The Department has not been consistent in its application of 20.2.37 NMAC. However, the Department's current position is that the facility appears to be subject to 20.2.37, but there do not appear to be any applicable standards for a sweet natural gas processing plant in the regulation. The purpose of the facility is to compress, dehydrate, and remove CO2 and water from coal-seam and conventional natural gas.
2.38	Hydrocarbon Storage Facilities	N	20.2.38.112 NMAC. The volume of the four condensate storage tanks (T-91019, 91020, 91021, & 91028) is greater than 65,000 gallons (67,500 gal). **However, the configuration of the tanks is such that the capacity is approximately 52,861 gallons. Therefore, this regulation does not apply.** Each tank sits on the same grade. The first 2 tanks are the same height, the next tank is a foot taller, and the 4th tank is 7 feet taller (last two built taller and narrower). The tanks are connected with a manifold. As the condensate flows into the first tank, it continues to flow to the downstream tanks keeping the liquid at the same level. The level of condensate in the last two tanks can not be higher than the height of the first two tanks.
2.61	Smoke and Visible Emissions	Y	All engines, heaters, and flares are Stationary Combustion Equipment. This includes Units: 1-10, 15-18, 20, 28 & 37.

20 NMAC	Title	Applies (Y/N)	Comments
2.70	Operating Permits	Y	PTE is > 100 TPY, Source is major for NOx, CO, VOCs, Formaldehyde, and Total HAPs as defined at 20.2.70.200 NMAC.
2.71	Operating Permit Fees	Y	Source is subject to 20.2.70 NMAC as cited at 20.2.71.109 NMAC.
2.72	Construction Permits	Y	Facility is subject to 20.2.72 NMAC, including NSR Permit 0340M9 and partial permit M10.
2.73	NOI & Emissions Inventory Requirements	Y	Applicable to all facilities that require a permit. Source is major for NOx, CO, & VOCs.
2.74	Permits- Prevention of Significant Deterioration	Y	Source is not one of the 28 listed. PTE = 478 tpy CO, 338 tpy NOx, and 327 tpy VOC. The source is an existing PSD major source and has existing BACT limits. The permittee is subject to 202.2.74.200 NMAC applicability determinations.
2.75	Construction Permit Fees	N	This facility is subject to 20.2.71 NMAC.
2.77	New Source Performance	Y	Applies to any stationary source constructing or modifying and which is subject to the requirements of 40 CFR Part 60 and 40 CFR 60 Subpart GG applies to Units 15 and 16. Subpart JJJJ may apply to engines not yet installed (manufacturer dates are not known).
2.78	Emissions Standards for HAPs	N	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 61
2.79	Permits – Nonattainment Areas	N	This facility is or is not located in a non-attainment area
2.82	MACT Standards for Source Categories of HAPs	Y	This regulation applies to all sources emitting hazardous air pollutants, which are subject to the requirements of 40 CFR Part 63 and 40 CFR 63 Subparts HH & ZZZZ apply.

11.0 Federal Regulatory Analysis:

Air Programs Subchapter C (40 CFR 50)	National Primary and Secondary Ambient Air Quality Standards	Applies (Y/N)	Comments
C	Federal Ambient Air Quality Standards	Y	Defined as applicable at 20.2.70.7.E.11, and 20.2.72. Any national ambient air quality standard.

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Applies if any other subpart applies and GG applies. JJJJ may apply if and when Units 10 is installed.
40 CFR 60, Subpart K, Ka, and Kb	Standards of Performance for Petroleum Liquids 6-11-73 to 5-19-78; Storage Vessels for Petroleum Liquids 5-18-78 to 7-23-84; and Volatile Organic Liquid Storage Vessels after 7-23-84	N	The facility tanks are not subject to K, Ka, or Kb. With the exception of T-31, no tanks have threshold capacities equal to or greater than 40,000 gal (threshold for K, Ka) or greater than 19,812 gallons (threshold for Kb). Condensate is treated and stored before custody transfer. T-31 does has a capacity greater than 19,812 gal but the true vapor pressure of the amine is less than 15 kPa. Therefore, it is not subject to Kb.
40 CFR 60.330 Subpart GG	Stationary Gas Turbines	Y	Subpart GG, *Standards of Performance for Stationary Gas Turbines*, is applicable because Units 15 and 16 were constructed, reconstructed or modified after the applicability date of October 3, 1977 and have a heat input at peak load greater than the applicability threshold of 10.15 MMBtu/hr. NO_X emissions in the exhaust gas of each turbine shall not exceed 150 ppm at 15% oxygen on a dry basis and the fuel burned in the turbine shall not contain sulfur in excess of 0.8% by weight (8000 ppmw). This regulation limits the sulfur content of exhaust gas to no more than 0.015 percent by volume at 15 percent oxygen on a dry basis or WFC must demonstrate the fuel used in affected turbines does not contain sulfur in excess of 0.8 percent by weight. No daily monitoring of fuel bound nitrogen is required. The plant will continue to comply with the monitoring requirements of the Subpart. **Note:** GG does not require recordkeeping (or

NSPS Subpart (40 CFR 60)	Title	Applies (Y/N)	Comments
			reporting) of the monitoring, but the Department included a condition to requiring the recordkeeping of the GG monitoring. Williams Four Corners has not opted for the exemption in 40CFR60.334(h) and therefore still uses a Custom Fuel Monitoring Scheduled approved by the Department. The facility uses field gas after the CO_2 has been stripped out.
40 CFR Part 60 Subpart JJJJ	Standards of Performance for Stationary Spark Ignition Internal Combustion Engines	Y (TBD for permitted, but not yet installed engines.)	This regulation does not apply to the 4SLB stationary SI ICE (Units 1-9) currently at the plant because they commenced construction prior to June 12, 2006 and they were manufactured prior to January 1, 2008. This regulation does not apply to the 4SRB stationary SI ICE (Units 17 & 18) because they were manufactured prior to July 1, 2007. This regulation will apply to Unit 10 if constructed (ordered) after 6/12/2006 and manufactured after 1/1/8 for Unit 10 (1232 hp)

NESHAP Subpart (40 CFR 61)	Title	Applies (Y/N)	Comments
A	General Provisions	N	Applies if any other subpart applies and no subpart applies.
40 CFR 61 Subpart V	National Emission Standards for Equipment Leaks (Fugitive Emission Sources)	N	This facility is not in VHAP service.

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
A	General Provisions	Y	Applies if any other subpart applies and Subparts HH & ZZZZ apply.
40 CFR 63.760 Subpart HH	Oil and Natural Gas Production Facilities –	N	The facility is an area source of HAPs, as defined by this subpart. This regulation is no longer applicable due to the recent decommissioning of all dehydrator equipment. The plant does not contain storage vessels with the potential for major levels of flashing losses or compressors or ancillary equipment in volatile HAP service as defined by the subpart, thus these portions of the regulation are not applicable.
40 CFR 63 Subpart ZZZZ	National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion	Y	Subpart ZZZZ, National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines, is applicable as the facility is a major HAP source as

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
	Engines (RICE MACT)		defined by the subpart (total formaldehyde is 24.9). Subpart ZZZZ applies differently to the various engine types found at El Cedro. The 4-stroke lean-burn engines currently in operation at the facility (Units 1-9) were constructed before the applicability threshold date of December 19, 2002, and meet the definition as "Existing". Thus, although they are affected sources as defined by the regulation, as per 63.6600(c), they are exempt from the regulation and Subpart A, per 63.6590(b)(3). The existing Waukesha 7042G engine (Unit 17) and the existing Waukesha 7042GSI engine (Unit 18) are all 4-stroke rich burn (4SRB) > 500 hp RICE, constructed prior to December 19, 2002, and required to meet the requirements of the regulation, per 63.6590(a)(1). If and when they are installed, the proposed new 4SLB (1232hp) Waukesha L7042GL (Unit 10) may be subject to the regulation. The engines subject to this regulation shall have emissions and operating limitations. In brief, the requirements include: Formaldehyde emissions must be reduced by at least 76%, or must be limited to 350 ppbvd at 15% oxygen, and WFC must maintain the pressure drop across the catalytic converter and the exhaust temperature into the catalytic converter within the specified limits identified in Tables 1a and 1b of the regulation; Within 180 days of the unit's compliance date (63.6610) initial compliance testing must be conducted in accordance with EPA test methods. This testing applies to existing and new units. Subsequent performance tests are to be conducted semi-annually; and Catalytic converter pressure drop and inlet exhaust temperature must be monitored and reported in accordance with Tables 6 and 7; operation inconsistent with the startup, shutdown, malfunction plan required by 63.6(e)(3) must file immediate reports.
40 CFR 63 Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for	N	The facility is a major source of HAPs, however, this regulation gives the option, in §63.7485, of using the

MACT Subpart (40 CFR 63)	Title	Applies (Y/N)	Comments
	Industrial, Commercial, and Institutional Boilers and Process Heaters		Subpart HH definition of Major source and since this facility is not a Gas plant and is prior to custody transfer, the facility only counts the dehydrator emissions to determine major source status for this regulation. The source is not major based on the dehydrator emissions and thus is not subject to this regulation.
40 CFR 63 Subpart CCCCCC	National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities	Y	This regulation is applicable because the facility is equipped with a gasoline storage tank. Since the gasoline dispensing facility has a monthly throughput of less than 10,000 gallons, WFC must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time: minimize gasoline spills, clean up spills as expeditiously as practicable, cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use, minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. The facility must also maintain records demonstrating the monthly throughput is less than 10,000 gallons.

Miscellaneous	Title	Applies (Y/N)	Comments
40 CFR 64	Compliance Assurance Monitoring	Y	CAM applies to Units 17 and 18. CAM applicable emissions for these sources include NOx and CO for all units (PTE for all units is > 100 TPY for NOx and CO and all units require control equipment to meet applicable standards).
40 CFR 68	Chemical Accident Prevention	N	68.115(b)(iii) exempts “naturally occurring hydrocarbons” (condensate, crude oil, field gas, produced water) before entering a processing plant from threshold determination.
40 CFR 70	Title V- State Operating Permit Programs	N	Operating Permit Program – is not applicable – New Mexico State has full delegated authority and Title V is administered under 20.2.70 NMAC.

12.0 **Exempt and/or Insignificant Equipment that do not require monitoring**:

Exempt Equipment Table

Unit Number	Source Description	Manufacturer	Model No.	Max Capacity	List Specific 20.2.72.202 NMAC Exemption (e.g. 20.2.72.202.B.5)

			Serial No.	Capacity Units	Insignificant Activity citation (e.g. IA List Item #1.a)
19	Reciprocating Engine (Generator #4)	Waukesha	F2895GSI	602	20.2.72.202.B(3)
			361831	hp	#7
31	Amine Contactor Still Vent			85	20.2.72.202.B(5)
				MMcf/day	#1a & #1b
39	Water Tank Heater			0.25	20.2.72.202.B(5)
				MMBtu/hr	#1a & #1b
40	Tech Shop Heater			0.125	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
41	Maintenance Shop Heater			0.125	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
42	Maintenance Shop Heater			0.125	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
43	Maintenance Shop Heater			0.125	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
44	Generator Building Heater			0.125	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
45	Tech Shop Heater			0.25	20.2.72.202.B(1)(a)
				MMBtu/hr	#1a, #1b & 3
T1-T10	Lubrication Oil Storage Tanks (RICE day tanks)			500	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T15	Lubrication Oil Storage Tank (for RICE)			100	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T16	Used Oil Storage Tank (for RICE)			165	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T17	Waste Water Storage Tank			300	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T19	Used Oil Storage Tank			500	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T20	Gasoline Storage Tank			500	20.2.72.202.B(5)
				gal	
T21	Diesel Storage Tank			300	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T22	Lubrication Oil Storage Tank (for turbines)			150	20.2.72.202.B(2)
				bbl	#1a, #1b & 5

T23	Lubrication Oil Storage Tank (turbine day tank)			800	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T24	Lubrication Oil Storage Tank (generator engine day tank)			600	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T28	Waste Water Overflow Storage Tank			165	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T30	Waste Water Storage Tank (for RICE)			165	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T32	Amine Storage Tank			300	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T33	De-ionized Water Storage Tank			500	Not An Emissions Source
				bbl	For Information Only
T34	De-ionized Water Storage Tank			300	Not An Emissions Source
				bbl	For Information Only
T35	Methanol Storage Tank			1,100	Not An Emissions Source
				gal	For Information Only
T36	Methanol Storage Tank			300	Not An Emissions Source
				bbl	For Information Only
T37	Glycol Storage Tank (dehydrator day tank)			500	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T38	Glycol Storage Tank			300	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T40	Used Glycol Storage Tank			300	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T41	Utility Water Storage Tank			500	Not An Emissions Source
				bbl	For Information Only
T42*	Used Oil Filter Storage Tank			100	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T43*	Used Oil Filter Storage Tank			500	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T44*	Used Oil Storage Tank (for generator engines)			882	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T46 & T47*	Media Heat Release			120	20.2.72.202.B(2)

	Storage Tanks			bbl	#1a, #1b & 5
T48*	Heat Media Relief Storage Tank			200	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T49*	Emulsotron Storage Tank			65	20.2.72.202.B(5)
				gal	#1a & #1b
T50 & T51*	De-ionized Water Storage Tank (for turbines)			8,000	Not An Emissions Source
				gal	For Information Only
T52*	Corrosion Inhibitor Storage Tank			225	20.2.72.202.B(5)
				gal	#1a & #1b
T53*	Used Oil Storage Tank			50	20.2.72.202.B(2)
				bbl	#1a, #1b & 5
T54*	Antifreeze Storage Tank			500	20.2.72.202.B(2)
				gal	#1a, #1b & 5
T55*	Soap Storage Tank			500	Not An Emissions Source
				gal	For Information Only

*new in this permitting action

13.0 **New/Modified/Unique Conditions** (Format: Condition#: Explanation):

MONITORING SPECIFICATIONS:

Emission unit Nos.	Parameters To Monitor	To Comply With	Monitoring Required	Monitoring Conditions
Facility Fuel	Fuel Quality	Operational Requirement	Sulfur Content	A110
1-10, 15-18, 20, 28 and 37	Visible emissions	20.2.61 NMAC	Opacity	A111
TV permit needs to be modified to include 17 and 18	Engine emissions control (catalyst)	40 CFR 64	CAM Plan	A206
Monitoring for IC Engines				
17 & 18	Hours of Operation	Condition A201.A	Operational Log	A201.A
10	NOx, CO	Emission Limits specified in A106	Initial Compliance Test	A201.B
1-10,17 & 18	NOx, CO, VOC	Emission Limits specified in A106	Periodic Emissions Tests (Quarterly)	A201.C

Emission unit Nos.	Parameters To Monitor	To Comply With	Monitoring Required	Monitoring Conditions
17,18	NOx, CO, VOC	Emission Limits specified in A106	Air Fuel Ratio (AFR) Controller and Non-Selective Catalytic Converter Operation	A201.D
10	NOx, CO, VOC	Emission Limits specified in A106	40 CFR 60, Subpart JJJJ	A201.E
10,17,18	NOx, CO, VOC	Emission Limits specified in A106	40 CFR 63, Subpart ZZZZ	A201.F
Monitoring for Glycol Dehydrators – Removed in this action				
Monitoring for Tanks				
T91019, T91020, T91021, T91028, 38	Condensate throughput	Emission Limits specified in A106	Operations Monitoring	A203.A
T91019, T91020, T91021, T91028	Condensate stabilizer operation	Emission Limits specified in A106	Operations Monitoring	A203.B
T91019, T91020, T91021, T91028	Separator pressure	Emission Limits specified in A106	Operations Monitoring	A203.C
T91019, T91020, T91021, T91028	Tank configuration	Emission Limits specified in A106	Operations Monitoring	A203.D
Monitoring for Turbines				
15, 16	NOx, CO, VOC	Emission Limits specified in A106 and BACT limits	Periodic Emissions Test (annually)	A205.A
15, 16	NOx, CO, VOC	Emission Limits specified in A106 and BACT limits	40 CFR 60, Subpart GG	A205.B

14.0 <u>Cross Reference Table between NSR Permit and TV Permit. TV permit actions only</u>

15.0 **Permit specialist's notes to other NSR or Title V permitting staff concerning changes and updates to permit conditions.**

A. Permittee requested listing the site horsepower for turbine units 15 and 16 based on the Solar calculated derated capacity at 0 ^{o}F instead of the normal ISO (59 ^{o}F) value. Solar's data sheet shows that at 0 ^{o}F the unit would emit the permitted mass emissions when the unit is emitting NOx at 38 ppmv @ 15% O2. This is lower than the 42 ppmv BACT limit and thus at this specific situation (at 0 ^{o}F) the mass emission limit for NOx and the BACT limit of 42 ppmv do not line up as equivalent. Since, operations at ambient temperatures that are at or below zero are very limited for the location, no further restrictions are deemed necessary. The table 104 data for the turbines specify that the requested horsepower rating is at 0 ^{o}F.
B. The permittee requested, late in the permitting process, to remove Units 31 (existing exempt Amine treater) and Unit 22a&b (existing Glycol dehydrator and reboiler).

These units have not operated in some time and will be permanently isolated from the process. Thus retired in place.

C. Revised condensate stabilizer output monitoring by basing the flow totals completely on the truck load-out tickets. Any bypass of the stabilizer will be tracked by the operator that manually bypassed the stabilizer by manually monitoring the storage tanks liquid levels at the beginning and end of the bypass. The change in levels will then be used to calculated the volume of condensate that bypassed the stabilizer.

D. The permittee submitted the following with the request to re-permit Unit 37 and removal of Unit 46.

> "There was some nameplate confusion on the stabilizer re-boiler, which resulted in the unnecessary permitting of Unit 46 in 2013. We since have confirmed that the re-boiler was originally permitted correctly in September 2008 (340-M8) as Unit 37. Unit 37 is still the unit on-site. Thus, we are going to remove Unit 46 from the application and re-activate Unit 37."